

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

(1) GEORGE COLLINS and )  
(2) ALRIKA COLLINS, )  
                            )  
Plaintiffs,             )  
                            )  
v.                         ) Case No. 22-cv-00318-Raw-Jar  
                            )  
                            )  
(1) STATE FARM FIRE AND )  
CASUALTY COMPANY,        )  
                            )  
Defendant.                )  
                            )

**JOINT STATUS DISCOVERY REPORT**

**COME NOW** the parties, by and through their respective counsel of record, and for their Joint Status Discovery Report, do hereby state and allege as follows:

1. On February 17, 2023, the court entered the parties' current Scheduling Order.
2. According to the initial Scheduling Order, a Zoom Status Conference call was to be conducted on April 27, 2023, and the parties were to file a Joint Status Discovery Report on or before May 19, 2023.
3. On March 14, 2023, this Court rescheduled the Zoom Status Conference call for May 22, 2023. However, no modifications were made to the Joint Status Discovery Report.
4. Therefore, this will serve as the parties' Joint Status Discovery Report:
  - (1) Plaintiff issued written discovery on April 4, 2023. Defendant issued written discovery on April 11, 2023.
  - (2) Defendant is responding to Plaintiffs' written discovery on May 22, 2023 by agreement of the parties. Plaintiffs are responding to Defendant's written discovery on May 29, 2023 by agreement of the parties.
  - (3) Defendant anticipates producing approximately 8,500 documents with its discovery. Plaintiffs, with their initial disclosures, produced 1,044 documents. Plaintiffs anticipate producing several hundred more documents.

- (4) No depositions have been obtained by either party at this time. The parties have scheduled a site inspection to occur on May 19, 2023.
- (5) Defendant intends to depose the Plaintiffs, George and Alrika Collins, as well as their contractor Chad Williams, and public adjuster Ian Rupert. Plaintiffs plan to depose Ed Young, State Farm Claim Specialist; Karla Tillberg, State Farm Claim Specialist; a corporate representative for State Farm and then experts after those disclosures.
- (6) Defendant has issued subpoenas to Plaintiffs' contractor Chad Williams, and Plaintiffs' public adjuster Ian Rupert. At this time, the non-parties have not responded to Defendant's subpoenas. Plaintiffs have not issued any subpoenas at this time.
- (7) The parties have previously requested, and the court has granted an extension to the parties' expert reports. Given the outstanding depositions remaining, the parties may seek an extension of discovery cut-off, currently scheduled for July 14, 2023.

Respectfully submitted,

**ATKINSON, BRITTINGHAM,  
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A PROFESSIONAL CORPORATION

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